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April 6, 2025

VIA ECF

The Honorable Michael A. Hammer
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Khalil v. Joyce, et al., Case No: 2:25-cv-01963-MEF-MAH

Dear Judge Hammer:

On behalf of the Petitioner, I am submitting a motion for Marc Van Der Hout, Johnny Sinodis, and Oona Cahill to be admitted Pro Hac Vice.

On March 21, 2025, co-counsel in this matter contacted counsel for the Government who advised that they do not object to any of the admissions for Petitioner's attorneys. Pursuant to the Court's preferences, I am attaching to this letter a proposed form of order along with a certification from the applicants: (1) Marc Van Der Hout; (2) Johnny Sinodis; and (3) Oona Cahill, providing the information required by L.Civ.R. 101.1(c) and my certification stating that I will be responsible for their conduct in this matter and will otherwise comply with L.Civ.R. 101(c).

Thank you very much for the Court's time and consideration.

Respectfully submitted,

/s/ Naz Ahmad
Naz Ahmad